

HINSHAW & CULBERTSON LLP

Attorneys for Defendants

Edward K. Lenci

Concepcion Montoya

Theresa Concepcion

800 Third Avenue, 13th Floor

New York, New York 10022

Tel: (212) 471-6200

Fax: (212) 935-1166

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SADAF SHIRVANI a/k/a KRISTY SHIRVANI, on
behalf of herself and all others similarly situated,

Plaintiff,

-VS-

XEROX EDUCATION SERVICES, LLC, f/k/a ACS
EDUCATION SERVICES, INC. and U.S. BANK, N.A.,

Defendants.

Case No. 13-cv-7295 (LAK)

**NOTICE OF MOTION TO
TRANSFER VENUE OR DISMISS**

PLEASE TAKE NOTICE, that upon the accompanying Declarations of Jamie Broedel and Edward K. Lenci dated December 2, 2013, and the accompanying Defendants' Memorandum of Law in Support of Their Motion to Transfer Venue or, Alternatively, Dismiss, Defendants will move this Court, before the Honorable Lewis A. Kaplan, in the U.S. Courthouse, Courtroom 21B, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order granting transfer of this action to the U.S. District Court for the Northern District of New York pursuant to 28 U.S.C. §1404(a) or, alternatively, dismissing the Class Action Complaint pursuant to Rule 12(b)(6).

Dated: New York, New York
December 2, 2013

HINSHAW & CULBERTSON LLP
Attorneys for Defendants

By: 

Edward K. Lendi (EL 3207)

800 Third Avenue, 13th Floor
New York, New York 10022
Tel: (212) 471-6200
Fax: (212) 935-1166

TO: Lawrence P. Eigel, Esq.
Justin A. Kuehn, Esq.
BRAGAR, EAGEL LAW FIRM
Attorneys for Plaintiff
885 Third Avenue, Suite 3040
New York, New York 10022
Tel: (212) 308-5858
Fax: (212) 486-0462